

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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TODD WOLF,

Plaintiff,

Case No. 23-cv-149

v.

CITY OF SHEBOYGAN, et. al.

Defendants.

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**JOINT STIPULATED CIVIL L.R. 7(H) EXPEDITED NON-DISPOSITIVE  
MOTION TO ENLARGE DEADLINES**

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**COME NOW** Plaintiff Todd Wolf (“Plaintiff”) and Defendants City of Sheboygan, Mayor Ryan Sorenson, City Attorney Charles Adams, Betty Ackley, Dean Dekker, Barbara Felde, Roberta Filicky-Peneski, Grazia Perrella, Angela Ramey, Zachary Rust, Amanda Salazar, Mary Lynne Donohue, and Jill Pedigo Hall (“Defendants”), pursuant to Fed. R. Civ. P. 26(c) and Civil L. R. 26(e), and for their Joint Motion to Enlarge the Written Discovery Deadline and Defendants’ Expert Designation Deadline hereby state as follows:

1. On September 22, 2023, this Court established Plaintiff’s expert designation deadline as January 15, 2024, and Defendants’ expert designation deadline as March 15, 2024, and a written discovery deadline of May 15, 2024. (Dkt. No. 68)
2. On January 10, 2024, the parties filed a Joint Unopposed Non-Dispositive Motion Under Rule 7(h) to Extend the Deadline for Expert Disclosures. (Dkt. No. 73)
3. The Court entered an Order on January 11, 2024 granting the parties’ joint motion for extension of time. (Dkt. No. 74) Plaintiff’s deadline to disclose expert witnesses was extended

to February 15, 2024. Defendants' deadline to disclose expert witnesses was extended to April 15, 2024.

4. On February 15, 2024, Plaintiff provided fully redacted expert reports pending the Court's entry of a Protective Order in this matter. Plaintiff did not provide unredacted copies of his experts reports until March 24, 2024.

5. On April 9, 2024, the Parties filed a Joint Unopposed Non-Dispositive Motion Under Rule 7(h) to enlarge several case deadlines, including Defendants' Expert Witness Designation Deadline to June 1, 2024; Deposition Deadline to July 15, 2024 and Dispositive Motion Deadline to August 15, 2024. (Dkt. No. 96) The Court entered a Text Order on April 22, 2024 granting the parties Joint Motion.

6. Plaintiff's deposition is currently scheduled for May 31, 2024.

7. Defendants experts cannot finalize their opinions and reports prior to reviewing Plaintiff's deposition transcript.

8. Defendants respectfully request an extension of their expert designation deadline from June 1 to June 24, 2024.

9. The Parties also request an extension of the written discovery deadline from May 15 to June 15, 2024.

10. No trial date has been set in this case and an enlargement of the written discovery deadline and Defendants' expert designation deadline will not unduly delay this case.

**WHEREFORE**, the Parties respectfully request that this Court GRANT their request to enlarge the timeframe for all written discovery to be completed by June 15, 2024 and for Defendants to disclose their expert witnesses in this matter by June 24, 2024.

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